



November 13, 2009

Reply to Attn of:

140

TO: Distribution

FROM: 140/Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Attendance at
Maryland Space Business Roundtable Terra Reception

On December 14, 2009, the Maryland Space Business Roundtable (MSBR) is sponsoring a discussion and reception to recognize the 10th anniversary of Terra, the first of the Earth Observing System (EOS) satellites. The event, *Terra@10: Past, Present, and Future*, will be held at the Marriott Union Square Hotel in San Francisco.

Approximately 300 people have been invited to attend the event, representing NASA, NOAA, other Federal agencies, universities, science organizations, and industry. The estimated cost per person is \$60.

Attendance at the event will allow NASA employees an opportunity to discuss Terra's contributions to science and our understanding of the Earth with other attendees from government, universities, science organizations, and industry. I therefore conclude that NASA's interest in its employees attending this event outweighs any concern that attendance may, or may appear to, improperly influence NASA employees in the performance of their official duties.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). Accordingly, NASA employees whose duties do not substantially affect MSBR or a majority of its members may accept free attendance to the event for themselves and their guests.

NASA employees whose duties substantially affect MSBR or a majority of its members, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Robert M. Stephens", with a long, sweeping horizontal line extending to the right.

Robert M. Stephens